C-8353 SUPREME COURT OF TEXAS CASES EDGEWOOD INDEPENDENT SCHOOL DISTRICT, ET AL. U. 1988-89 WILLIAM, ET AL. (3RD DISTRICT)

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#### STATEMENT OF AMICUS CURIAE,

I am writing to request that you hear the Edgewood v. Kirby suit on behalf of the school districts in Texas with low property values per student.

Sanger ISD has the second highest tax rate out of the eleven schools in Denton County, and at the same time, Sanger has the second lowest value per student in Denton County - this is no coincidence. As a result, our school does not have adequate funds to meet state mandates, provide adequate science labs, etc.

A student's educational opportunities should not be determined by where he or she happens to be born or where his or her parents happen to live.

I authorize an attorney selected by the Equity Center to incorporate this statement in an amicus brief on my behalf supporting Petitioners and Petitioner-Intervenors in the Edgewood case.

Sincerely,

Carol a Monis Tapayer Parent Teacher

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Thank you,

Merlin Rodgers

Teacher

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Parent

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Thank you, Davida Moore

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As an educator in a property poor district, I am vitally interested in equity between the so called "property poor" and the wealthier districts in the state. In the last several years Sanger High School has lost state funding due to the PDI which is a part the funding formula. This has caused undue strain on the local budget which had to be cut due to a shortage of money. As principal of the high school, I have seen my instructional budget increased to raise standards and then reduced for two years straight to keep down the deficit. I have had my faculty cut by three teachers while the enrollment has remained essentially the same; consequently, the number of elective courses available to the student has been reduced. I have had extracurricular budgets cut in all areas. I have had to move classes into portable buildings instead of building additional permanent classrooms.

This puts the students of Sanger and other "property poor" districts at a disadvantage in giving its students the same advantages as the richer school. It limits the opportunities that the students need to compete with students from the wealthier districts. It discourages the students in achieving the excellence that should be sought in every educational setting.

This has also caused morale problems among the faculty with several professionals seeking employment elsewhere for more money and where more instructional materials are available. Teachers also have begun to wonder whether they are really important since their needs for the classroom are not being met.

I hope that these comments will help in making a decision to see that funding will be made more equitable among all the districts of Texas and not favor those districts with with larger population or greater tax base.

Thank you

Bill Mustin.

Bill Mustin

Principal, Parent, Citizen

#### STATEMENT OF AMICUS CURIAE, Vickie Jenkins

I am vitally concerned about public education in Texas and about the failure of the Legislature and Governor to support an equitable method for distribution of state funds in Texas.

As a parent of two graduates of Sanger High School and a taxpayer, I am concerned because of the rising cost in our school district. My concern is well warranted because we pay higher taxes than any other school in our district, but our children have not benefited educationally. The good teachers we have are spread so thin it is not possible for them to do their job. For example, a high school with approximately 400 students has to share a counselor with the middle school. This gives one counselor the impossible job of working with almost 700 students. I find this appalling; a counselor's job is too important.

In short, we need your help for the benefit of the future of Texas.

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Thank you

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Parent

#### STATEMENT OF AMICUS CURIAE, SUSAN BURKHART

I am concerned about the overall quality of education in the state of Texas and about the failure of the Legislature and Governor to support an equitable method for the distribution of state funds in Texas.

To meet the increasing cost of operating the Sanger ISD, due to the failure of the State of Texas to adequately fund public education, the local Board of Sanger has already taken the following action this year:

- 1) Lowered the local increment paid to teachers by \$500.00.
- 2) Cut staff (two teachers, three part-time custodians, and two cooks).
- 3) Cut practically all budget areas (maintenance by \$50,000, extracurricular--athletics, band, drama, etc.) by 14%.
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- 6) Did not meet the 22 to 1 student/teacher ratio in grades 3 and 4.
- 7) Raised local taxes by approximately 2.9%.

In spite of the measures mentioned above, the SISD projects a \$110,000 deficit for the current school year. We are just one of many school districts with these common problems.

What happens when the low property value districts are rendered inoperable? Who will be to blame?

If Texas expects to have a prosperous future, an investment must be made in the leaders of tomorrow.

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Sincerely, Susan R. Bul

Susan R. Burkhart

Concerned Texan

# TOWN ESS &COUNTRY FOR GARDENS

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### STATEMENT OF AMICUS CURIAE, Wayne Tutt

As a taxpayer, I have only now come to realize that all of the rest of the school districts in the metroplex have not been paying a tax rate as high as \$1.24 just to support their schools.

I did not know that the so-called school reform and that the equity in the distribution of state funds to public schools started by H.B. 72 has not been met by the legislature until just recently.

A student's educational opportunities should not be determined by where he or she happens to be born or where his or her parents happen to live.

I urge you to hear and rule in favor of equity in state funds distributed to the public schools in Texas.

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Skank you, Leggy Hayes Parent

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Our schools' budget has been cut in almost all areas. The high school building needs to be rebuilt. The roof leass and we need more room for lockers and equipment. As it now stands just the maintenance has been cut by \$50,000. More staff is needed but already 2 teachers, 3 part-time custodians and 2 cooks have been cut. Last year they were wanting to cut Ag teachers and the Ag program. We need these things for the students to be able to advance to the level needed. Some parents are trying to take up the slack by spending time helping the teachers work with students or grade papers. This is nice, but, not everyone can spend their time at the school. In short, they can not be counted on when needed the most. Ninety-three other employees' salaries have been frozen. Extra-curricular activity has been cut. And local taxes have been raised by 2.9%. Still, the Sanger Independent School District projects a \$110,000 deficit for the current school year.

If this is allowed to continue there will almost certainly be further damages to the district and the education of the students of Sanger ISD.

I authorize an attorney selected by the Equity Center to incorporate this statement in an amicus brief supporting Petitioners and Petitioner Intervenors in the Edgewood case.

Thank you,

Mancy Nausenflush.
Nancy Hausenfluck

Parent - Sanger ISD

Statement of amicies Cerriar, Execus Brittin

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> Skank your, Green Butter

#### CERTIFICATE OF SERVICE

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Sandra R. Nicolas

State Bar Number 15016500

ARNOLD AND NICOLAS 800 One Capitol Square 300 West Fifteenth Street Austin, Texas 78701 512-320-5200

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RECEIVED IN SUPPEME COURT OF TEXAS

NO. C-8353

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IN THE SUPREME COURT OF TEXAS

AUSTIN, TEXAS

EDGEWOOD INDEPENDENT SCHOOL DISTRICT, ET AL.,

Petitioners

V.

WILLIAM KIRBY, ET AL.,

Respondents

BRIEF OF AMICUS CURIAE IN SUPPORT OF THE PETITIONERS AND
PETITIONER-INTERVENORS BY THE
SCHOOLCHILDREN OF SANGER ISD, SANGER, TEXAS

**VOLUME I** 

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BRIEF OF AMICUS CURIAE IN SUPPORT OF PETITIONERS AND

PETITIONER-INTERVENORS BY THE

SCHOOLCHILDREN OF SANGER ISD, SANGER, TEXAS

VOLUME I

TO THE HONORABLE SUPREME COURT OF TEXAS:

Now come the schoolchildren of Sanger ISD, Sanger, Texas and submit the following statements in support of the ruling of the Honorable Harley Clark, Judge - 250th Judicial District, Travis County, in Cause Number 362,516.

The undersigned has been requested to submit these statements to the Court. The undersigned does not represent any party and has no monetary interest in the outcome of the litigation. The statements presented are from individuals

who have a substantial interest in preserving the State's ability to provide equitable public education to its citizens.

Accordingly, the schoolchildren of Sanger ISD, Sanger, Texas respectfully pray that this Court consider the attached statements (Volume I) and uphold the decision of the trial court in the case at bar.

Respectfully submitted, ARNOLD AND NICOLAS 800 One Capitol Square 300 West Fifteenth Street Austin, Texas 78701 512-320-5200

Sandra R. Nicolas

State Bar No. 15016500

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Statement of amicus Curice, Josh Dunter

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Sincerely, Josh Hunter 4th grade student

Statement of anicus Curiae Christina Rubicele There should bean equal amount of money spenton each school district in Jexas. Clur, parents pay more taxas then people in Pallas or Plamo Our playnow transpaper town lown because it was falling evant and we don't have money tolowy anymore. wo ni stiru trior ell workbooks and they are fulling apart and we have to type them again and again. They have to be ussed affair nextigear. outhorize an attorney selected by the Equity Centra ncorporate this statement in n amicus brief supporting etitionesand Petitionesand ntervens in the Edgwood case. Statement of amicus Cucaiae, Landy Hogan

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Statement of amicus Curias, Jachyn acherman

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Sincerch, Jaden Ockronan 4th grade Student, statement of amicus Curias, michael alexander

There should be an equal amount of money spent on each school district in Texas. Our parents are paying more money than Dallas pays. There are more than 22 students in our glass room. That's against the lay in Texas. We should be able to have as many supplies as the wealthy schools. I authorize an attorney selected by the Equity Center to incorporate this statement in an amicus brief supporting Petitiours and Petitioner I ntervence in the Edgewood Dincerely;

Dincerely; Michael alexander 4+h grade student

Statement of anicus Curica, Stephen Waide There should be an equal amount of money spent on each school district in Jeras. We don't Ne should have some playground equipment. Se t grade needs a new teacher because we have more than 22 kids in a class room.
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Statement of anicus aviae, bik Olson

There should be an equal amount of money spent on each school district in Texas. We have more than 22 students in our room and we are going to have more ment year. We have no playground equipment at all. We can't write in our worklook. Lecause we have to keep them for five years and they're only two years old and they're only two years old and they're already falling apart.

I authorize an attorney selected by the Equity Center to incorporate this statement in an amicus brief supporting Petitioners and Petitioner Intervenous in the Edgewood case.

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Sincerely, Eik Olson 4th grade student El totement of amicus Curios, Lindsay miller

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Vincerely, Scott Marrifo Fouth grade student

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Statement of Amirus Curioe, Dana Lynch Our schools have never had adequate fundo for buildings, excepment, supplier, personnel, est., yet, our school has for years had the record highest tax rate in Wenton Country. a students ability to succeed economically is impaired by inadequate educational opportunities. The young people in our community both want and diserve equal educational opportunities. I wrose you to vote hear edgewood V. "Kirby and to rule in favor of the low property value for student schools in state of Denas. I authorize an otherney selected by the Equitor center to incrporate this statement in an amicus -breef on my behalf supporting Petitioners and Petitionercluterners in the Edgewood case Lincerely, Dana Lynch student

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Statement of amicus curiae, adam Van Doren Our schools have never had adequate funds for building, quipment, supplies, personnaleta, yet, our school has for years had all second highest tam rate in Denton Country. a students ability to succeed economically is impaired by inadequate educational oppour ites. The young people in our community both want and deserve equal educational opportunités. urge you to lioth hear Edgewood V. Kirly and to rule in favor of the low property value per student schools in the state of archorize an attoney selected by the Equity Censer to incorporate this statement in an amicus bruly

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Statement of amicus Curius, Rusty Heider Iv alters

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## Statement of amigus Curiae, Alicia Ashbrook

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Sincerely, alicia Ashbrook student

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Sandra R. Nicolas

State Bar Number 15016500

ARNOLD AND NICOLAS 800 One Capitol Square 300 West Fifteenth Street Austin, Texas 78701 512-320-5200

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NO. C-8353

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IN THE SUPREME COURT OF TEXAS

AUSTIN, TEXAS

EDGEWOOD INDEPENDENT SCHOOL DISTRICT, ET AL.,

Petitioners

**V**.

WILLIAM KIRBY, ET AL.,

Respondents

PRIEF OF AMICUS CURIAE IN ; JPPORT OF THE PETITIONERS AND
PETITIONER-INTERVENORS BY THE
SCHOOLCHILDREN OF SANGER ISD, SANGER, TEXAS

**VOLUME II** 

# IN THE SUPREME COURT OF TEXAS AUSTIN, TEXAS

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BRIEF OF AMICUS CURIAE IN SUPPORT OF THE PETITIONERS AND
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**VOLUME II** 

IN THE

## SUPREME COURT OF TEXAS AUSTIN, TEXAS

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BRIEF OF AMICUS CURIAE IN SUPPORT OF PETITIONERS AND
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#### VOLUME II

TO THE HONORABLE SUPREME COURT OF TEXAS:

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The undersigned has been requested to submit these statements to the Court. The undersigned does not represent any party and has no monetary interest in the outcome of the litigation. The statements presented are from individuals

who have a substantial interest in preserving the State's ability to provide equitable public education to its citizens.

Accordingly, the schoolchildren of Sanger ISD, Sanger, Texas respectfully pray that this Court consider the attached statements (Volume II) and uphold the decision of the trial court in the case at bar.

Respectfully submitted, ARNOLD AND NICOLAS 800 One Capitol Square 300 West Fifteenth Street Austin, Texas 78701 512-320-5200

Sandra R. Nicolas

State Bar No. 15016500

#### STATEMENT OF AMICUS CURIAE, Staci Jenkins

I am vitally concerned about public education in Texas and about the failure of the Legislature and Governor to support an equitable method for the distribution of state funds in Texas.

As a senior in high school I have been witness to the disadvantages we in a less affluent school district have had. I have also noted that my family pays higher school taxes than do those in other school districts. These high tax dollars in our district do not go towards modern science equipment, restocking the library, more experienced teachers or even enough paper to last a whole year. Our higher taxes are necessary simply to keep the school doors open.

It is a terrible feeling when our football team and support groups travel twenty-five miles to play a football game and we feel like a small school playing a Southwest Conference Team because of the difference in their elaborate facilities and uniforms and ours. In short, Sanger I.S.D. has been at a large disadvantage because of the shortage of funds.

I authorize an attorney selected by the Equity Center to incorporate this statement in an amicus brief on my behalf supporting Petitioners and Petitioner-Intervenors in the Edgewood case.

Thank you,

Staci Jenkins

Student

#### STATEMENT OF AMICUS CURIAE, Cherise Frickman

I am vitally concerned about public education in Texas and about the failure of the Legislature and Governor to support an equitable method for the distribution of state funds in Texas.

Our teachers at our school have had to buy many materials for teaching their students and that is definetly unfair. Why should teachers have to use the money out of their pockets to buy necessary materials, is that right that teachers should have to do that?

More money is needed now for the low value districts to meet the challenge of educational reform; further delays will do irreparable damage.

I authorize an attorney selected by the Equity Center to incorporate this statement is an amicus brief on my behalf supporting Petitioners and Petitioner-Invervenors in the Edgewood case.

Mckina .

Thank you,

Cherise Frickman

Student

## STATEMENT OF AMICUS CURIAE, Keith IVY

I am vitally concerned about public education in Texas and about the failure of the Legislature and Governor to support an equitable method for the distribution of state funds in Texas.

Our schools have had roofs that leak, low salaries from the custodians to the superintendent, lack of equipment, etc., and high taxes for years. Our tax rate was \$1.20 per hundred back when \$0.50 and \$0.80 rates were considered high.

More money is needed now for the low value districts to meet the challenge of educational reform; further delays will do irreparable damage.

I authorize an attorney selected by the Equity Center to incorporate this statement is an amicus brief on my behalf supporting Petitioners and Petitioner—Intervenors in the Edgewood case.

Thank you,

Keth Juy

#### PLEASE NOTE:

The following statements are essentially identical to the first statement bound in this volume.

### STATEMENT OF AMICUS CURIAE, Eric Ison Ce Ballos

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fri J. Faller

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## STATEMENT OF AMICUS CURIAE, Homas Mullino

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Thomas Mullins.

# STATEMENT OF AMICUS CURIAE, John Burkhart

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Deresa ma Donnell

## STATEMENT OF AMICUS CURIAE, TIPP CHANHARMYMUI

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1 ephanie Howard

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Jayson E, Berndt

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Terry MolClure

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taniel father II

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Thank you,

Carol Rodgers

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Thank you, Kasey Crawford

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